

**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC. 20554**

**In the Matter of**

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	)	
<b>Amendment of Parts 2</b>	)	<b>RM-10209</b>
<b>and 97 of the</b>	)	
<b>Commissions Rules</b>	)	
<b>Regarding an Allocation</b>	)	
<b>of a Band near 5 Mhz to the</b>	)	
<b>Amateur Radio Service</b>	)	

**To: The Commission**

**COMMENTS of Nikolaus E. Leggett**  
**N3NL Amateur Radio Operator**

The following are comments from Nikolaus E. Leggett, an amateur extra class radio operator and a certified electronics technician.

I support the petition of the American Radio Relay League (ARRL) requesting the domestic allocation of 5.250 to 5.400 MHz to the Amateur Service on a secondary basis. This new allocation would greatly assist emergency and public service communication within the United States because it would overcome the propagation problems that often occur during daytime communications over intermediate distances.

The ARRL petition is very well researched and prepared. It deserves serious and expedited consideration by the Commission.

However, an additional restriction should probably be imposed on this allocation. During a serious emergency such as an earthquake or hurricane it is easy for radio equipment to be damaged or disabled. Unfortunately, many commercially-built amateur radio systems

are not easy to repair in the field. These amateur radios are designed without consideration of field repair aspects.

The Commission should require that all manufactured amateur radio transmitting and receiving equipment built to include this new allocation must be field-repairable in some manner. At the very least, each transmitter, receiver, or transceiver should consist of several field-replaceable circuit boards or modules. Preferably, the components in the equipment should be laid out in a manner that component-level repair and replacement can be accomplished in the field.

In my opinion, this requirement for field repair would enhance the public service and emergency communication aspects of this new amateur radio allocation.

Respectfully submitted,

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A copy of these comments has been sent to the American Radio Relay League (ARRL).